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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SUSIE LEAHY, individually and SUSIE  
LEAHY AS GUARDIAN AD LITEM FOR )  
REBECCA SUSAN LEAHY, a minor, )  
HANNAH JOY LEAHY, a minor, and )  
WILLIAM JOHN LEAHY, III, a minor, )

CASE NO: 2:10-CV-0082 GMN-PAL

Plaintiffs,

vs.

LONE MOUNTAIN AVIATION, INC., a  
corporation; and DOES 1 through 20,  
inclusive,

Defendants

**DEFENDANT LONE MOUNTAIN AVIATION, INC.'S MOTION  
TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS**

Defendant, LONE MOUNTAIN AVIATION, INC., by and through its attorneys, THE  
COBEAGA LAW FIRM, do hereby move this honorable Court for an extension of time to file  
Dispositive Motions. This request is set forth in the attached Affidavit of J. Mitchell Cobeaga,  
Esq. It is not anticipated that counsel for Plaintiff will object to this extension. This is the first  
request for any extension.

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1 Accordingly, an extension of one week, to an including February 6, 2012, in which to file  
2 said motions is hereby requested.

3 DATED the 24 day of January, 2012.

4 THE COBEAGA LAW FIRM

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6 J. MITCHELL COBEAGA, ESQ.  
7 Nevada Bar No. 0177  
8 550 E. Charleston Blvd., Suite D  
9 Las Vegas, Nevada 89104  
Attorneys for Defendant  
Lone Mountain Aviation, Inc.

10 **IT IS SO ORDERED** this 24th day of January, 2012.

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13 Gloria M. Navarro  
14 United States District Judge  
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AFFIDAVIT OF J. MITCHELL COBEAGA, ESQ.

STATE OF NEVADA                     )  
   )  
 COUNTY OF CLARK                    )           ss:

I, J. MITCHELL COBEAGA, ESQ., hereby am duly sworn under penalty of perjury, that the following is true of my own personal knowledge:

1. By Order of this Court, Dispositive Motions are to be filed by January 29, 2012.
2. There are two cases arising out of an aircraft accident which occurred here in Las Vegas on August 28, 2008. One is the pending action before this Court. The other is an action by the same Plaintiffs against another Defendant in a case styled SUSIE LEAHY, individually and SUSIE LEAHY AS GUARDIAN AD LITEM FOR REBECCA SUSAN LEAHY, a minor, HANNAH JOY LEAHY, a minor, and WILLIAM JOHN LEAHY, III, a minor v. SIGNATURE ENGINES, INC.; O&N AIRCRAFT MODIFICATIONS, INC.; AVIONICS, INC., presently pending in Federal Court in Cincinnati, Ohio.
3. The counsel for all parties in these two cases have been working together to coordinate discovery in order to cut down on duplication. In view of the fact that we have attorneys from four states involved in the case, certain depositions have been completed within the last two weeks.
4. Defendant Lone Mountain will be filing a Motion for Summary Judgment. This is an extremely complex case involving numerous experts, and a part of that Motion will be to exclude the testimony of Plaintiffs' experts based on *Daubert/Kumho* arguments. In order to properly set forth the basis for the *Daubert/Kumho* portion of the Motion, additional time is needed to obtain all transcripts and reports and to properly prepare the Motion.
5. Accordingly, Lone Mountain requests one additional week to properly prepare this Motion.
6. This present Motion is not brought for the purpose of any delay.

FURTHER AFFIANT SAYETH NAUGHT.

Sworn to before me this 24 day  
 of January 2012.

  
 J. MITCHELL COBEAGA, ESQ.

